

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

WILLIAM PLAGENS, Individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

JENNIFFER D. DECKARD,

Defendant.

Case No. 1:20-cv-02744-JPC

CLASS ACTION

Judge J. Philip Calabrese

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF PAGE LIMITS**

Lead Plaintiff Thomas Phelps and named Plaintiffs Sergio Baron and Neville Arjani (“Plaintiffs”) hereby move the Court for an extension of the applicable page limits for Plaintiffs’ brief in support of their forthcoming motion for preliminary approval of class action settlement. Plaintiffs request leave to file a brief up to 25 pages. Defendant does not oppose this motion.

As counsel for the parties informed the Court during the conference on September 12, 2023, the parties have reached a settlement in principle to resolve this Action. The parties are now working to memorialize the terms of their settlement agreement. Plaintiffs anticipate moving for preliminary approval of the class action settlement promptly upon executing the agreement.

Under Local Rule 7.1(f), non-dispositive motions are limited to 15 pages in length. Plaintiffs request leave to file a brief of up to 25 pages in order to sufficiently address the multitude of factors and issues the Court must consider in connection with the settlement approval process. This Court has recognized the inherent complexity of this securities class action, assigning this case to the “complex” track under Local Rule 16.2. ECF No. 61. Plaintiffs’ anticipated motion will necessarily address multiple related procedural and substantive issues, including: (1) whether the

proposed settlement merits preliminary approval under Fed. R. Civ. P. 23(e); (2) whether the proposed settlement class should be certified for the purposes of settlement under Fed. R. Civ. P. 23(a) and (b)(3); and (3) and whether the proposed plan for issuing notice to potential class members is adequate. Accordingly, Plaintiffs request an extension of the page limits to accommodate the complexity of their anticipated motion.

Dated: October 6, 2023

Respectfully submitted,

**KARON LLC**

/s/Daniel Karon

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